

TODD M. LEVENTHAL, ESQ
LEVENTHAL AND ASSOCIATES PLLC.
Nevada Bar No. 008543
California Bar No.223577
626 South Third Street
Las Vegas, Nevada 89101
(702) 427-8686
Attorney for Eric J. Goodall

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
ERIC JAMAR GOODALL,)
)
Defendant.)

2:15-cr-00077-JCM-VCF

**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, ERIC JAMAR GOODALL, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, DANIEL J. COWHIG, Assistant U.S. Attorney, that the sentencing in the above-captioned matter currently set for Monday, December 7, 2015 be reset for at least 90 days.

This Stipulation is entered into for the following reasons

1. Counsel needs additional time to properly effectuate the series of events remaining with this case and the defendant Mr. Goodall.
2. Other issues remain and are pending that are vital to the sentencing of Mr. Goodall.
3. Mr. Goodall is in custody and agrees to the continuance.
4. Additionally, denial of this request for a continuance could result in a miscarriage of justice.
5. Mr. Leventhal has spoken to DANIEL J. COWHIG, Assistant United States Attorney, and he has no objection to this continuance.

DATED this 25TH day of November, 2015.

-s-
TODD M. LEVENTHAL, ESQ.
Counsel for defendant

-s-
DANIEL J. COWHIG
Assistant U.S. Attorney

TODD M. LEVENTHAL, ESQ
LEVENTHAL AND ASSOCIATES PLLC.
Nevada Bar No. 008543
California Bar No.223577
626 South Third Street
Las Vegas, Nevada 89101
(702) 427-8686
Attorney for Eric J. Goodall

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	2:15-cr-00077-JCM-VCF
Plaintiff,)	
)	
vs.)	
)	
ERIC JAMAR GOODALL,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Counsel needs additional time to properly effectuate the series of events remaining with this case and the defendant Mr. Goodall.

2. Other issues remain and are pending that are vital to the sentencing of Mr. Goodall.

3. Mr. Goodall is in custody and agrees to the continuance.

4. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

5. Mr. Leventhal has spoken to DANIEL J. COWHIG, Assistant United States Attorney, and he has no objection to this continuance.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendants in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the

The continuance sought herein is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A) considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and (ii).

Accordingly, IT IS SO ORDERED that the current Sentencing and disposition setting is vacated and the same is continued and reset for March 7, 2016, at the hour of 10:00 a.m. in courtroom 6A.

James C. Mahan
JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE